



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 22, 2019

BY ECF

Honorable Richard M. Berman
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

**Re: United States v. Turkiye Halk Bankasi, A.S.,
S6 15 Cr. 867 (RMB)**

Dear Judge Berman,

In accordance with the Court's direction at today's initial appearance in this matter, the Government respectfully submits the attached proposed order regarding service of the summons on Turkiye Halk Bankasi, A.S. ("Halkbank" or the "defendant") and Halkbank's knowing and intentional failure to appear (Exhibit A).

Also attached for the Court's consideration in connection with the proposed order are: (1) an Investor Relations Disclosure by Halkbank dated October 16, 2019, and available on Halkbank's website¹ (Exhibit B); (2) an article dated October 16, 2019 published by the Financial Times, *Erdogan attacks 'ugly' US decision on Turkey Halkbank* (Exhibit C); (3) an article dated October 17, 2019 published by CNN, *Pence says Turkey raised Halkbank indictment after negotiations concluded* (Exhibit D); (4) an article dated October 20, 2019 published by Reuters, *Turkey says nothing will come of Halkbank case if law in U.S. works* (Exhibit E); and (5) a proposed second Summons in a Criminal Case.

With respect to the date of the Second Conference, the Government respectfully suggests that a date of Friday, November 1, 2019, would provide adequate time for notice of the Court's

¹ Available at https://www.halkbank.com.tr/images/channels/English/investor_relations/Disclosure_of_Events/2019/oct/Oct%2016%202019-Indictment%20Against%20the%20Bank%20by%20U_S_%20Attorney's%20Office%20for%20the%20Southern%20District%20of%20New%20York%20.pdf (last visited October 22, 2019).

order to the defendant and for the defendant to comply with the second summons and proposed Order.

Respectfully submitted,

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United States Attorney

by: /s/
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cc: Counsel of record (by ECF)